

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TOUCHPOINT PROJECTION
INNOVATIONS, LLC

v.

CNETWORKS CO., LTD,

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Case No. 2:23-cv-0233-JRG

**RESPONSE IN SUPPORT OF
CDNETWORKS' MOTION TO SET ASIDE DEFAULT (DKT. 10)**

Plaintiff Touchpoint Projection Innovations, LLC ("Plaintiff") files this response to join Defendant CDNetworks Co., Ltd.'s Motion to Set Aside Default (Dkt. 10).

CDNetworks engaged in discussions with Plaintiff starting as early as July of 2023.

Plaintiff does not adopt the arguments of CDNetworks. Plaintiff maintains that service on the Texas Secretary of State was proper service against CDNetworks.

Plaintiff looks forward to resolving this patent infringement litigation on the merits, and asks that the Court view this submission as a notice to the Court that this 2023 filed lawsuit is ready for an initial CMC.

August 8, 2024

/s/ Randall T. Garteiser

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CERTIFICATE OF CONFERENCE

The undersigned attorney represents and confirms that a conference was conducted with opposing counsel prior to filing this Response, and counsel indicated its agreement with the relief requested herein. CDNetworks does not agree that service on it was proper. It maintains that service is required through the Hague. The parties are at an impasse.

/s/ Randall T. Garteiser

Randall Garteiser

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above document has been served to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Randall T. Garteiser

Randall Garteiser

